

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 24-20171-CR-RAR**

UNITED STATES OF AMERICA

vs.

ESHWAR MOHABEER,

Defendant.

**STIPULATED FACTUAL BASIS
IN SUPPORT OF GUILTY PLEA**

ESHWAR MOHABEER (hereinafter referred to as the “Defendant”) hereby acknowledges that, had this case proceeded to trial, the United States would establish the following facts beyond a reasonable doubt:

The Defendant submitted and caused the submission, via interstate wire transmission, of a false and fraudulent Economic Injury Disaster Loan (EIDL) application directly to the Small Business Administration (SBA). Investigation has revealed that on June 25, 2020, the defendant submitted his first EIDL loan application. In this application the defendant stated that he had a sole proprietorship business involving transportation and day tours. BOP requires that all employees must report any outside employment, including self-employment, to BOP and the defendant did not report having any outside employment to BOP. The application stated that in the twelve (12) months prior to January 31, 2020, the defendant had gross revenues of \$195,000 and a cost of goods sold of \$100,000. He listed his home address as the principal place of business and his cell phone as the business’ phone number. The SBA accepted the representations in this application and awarded the defendant an EIDL loan in the amount of \$46,500. The proceeds of that loan were deposited into a Navy Federal Credit Union account controlled by the defendant. Shortly after the

loan was deposited into his account, the defendant transferred \$24,000 into his Charles Schwab brokerage account.

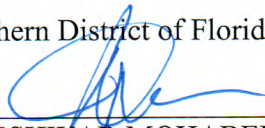
A review of the defendant's tax records, obtained through an *Ex-Parte* application, revealed that he was not truthful in the representations he made in his EIDL loan applications. The defendant did not file a Schedule C for a transportation business because he did not have a transportation business. The only other income that he reported was income for rental properties. The amount of income he reported fell far short of the \$195,000 that he claimed in his approved application.

On March 25, 2024, the defendant was interviewed by DOJ-OIG agents after receiving his *Garrity* warnings. During the course of a lengthy interview the defendant admitted that he was the person that submitted the loan application. He admitted that he was the person that answered all of the questions on the intake application. The defendant admitted that he did not have a transportation and day tours business. Finally, the defendant admitted that he transferred a portion of the loan proceed into his Schwab brokerage account.

After the defendant was indicted, he made full restitution to the Small Business Administration in the amount of \$46,500.

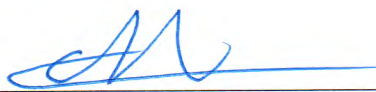
All of these events took place within the Southern District of Florida.

Date: 10/7/24




ESHWAR MOHABEER
Defendant

Date: 10/7/24



ANDREW FELDMAN
Attorney for ESHWAR MOHABEER

Date: 10/7/2024



DANIEL BERNSTEIN
Assistant United States Attorney